

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA
Harrisburg Division**

Michael James Walker,

Debtor.

Case No. 1:25-bk-01554-HWV
Chapter 13

Motion to Extend the Automatic Stay

Debtor Michael James Walker, through his attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on May 30, 2025. He has filed a plan and all schedules, statements, and other documents required by 11 U.S.C. §521(a)(1) and Fed. R. Bankr. P. 1007(b).
2. The Debtor was involved in one active bankruptcy between May 31, 2024, and May 30, 2025:

Case No.	District	Filed	Dismissed	Reason
24-00260	PAMB	02/02/2024	01/10/2025	material default

3. Because the Debtor was involved in only one active bankruptcy between May 31, 2024, and May 30, 2025, the automatic stay is set to expire on June 29, 2025. 11 U.S.C. § 362(c)(3)(A).

4. The Court may extend the automatic stay when a case is filed in good faith as to the creditors to be stayed. Good faith means that there are new circumstances demonstrating that the Debtor can probably reach the end of a chapter 13 plan. *In re Legree*, 285 B.R. 615, 620 (Bankr. E.D. Pa. 2002).


5. This case was filed in good faith. The debtor had a sudden, large dental care expense arise for which he did not have applicable insurance coverage during his prior case that caused him to fall behind on his plan payments. He has since resolved the expense, and he has already filed a Motion for Wage Attachment Order to ensure payment to the trustee in the instant case.

6. Because this case was filed in good faith, the Court must continue the automatic stay against all creditors until the Debtor receive a discharge.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: May 30, 2025

CIBIK LAW, P.C.
Counsel for Debtor

By: 

Michael A. Cibik (#23110)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com